

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:

Assembled Circuits, Inc.,

Debtor

) Chapter: 11

) Case no.: 04 B 10357

) Judge: John H. Squires

) Trustee: U. S. Trustee

NOTICE OF MOTION

To: See Service List Attached

Please take notice that on **Monday, May 24, 2004, at 9:30 a.m.**, or as soon thereafter as counsel may be heard, I shall appear before the **Honorable John H. Squires**, or any other judge sitting instead, in **courtroom 680** of the **Dirksen Federal Building, 219 South Dearborn, Chicago, Illinois**, and present the attached motion to vacate order modifying the automatic stay.



KOFKIN, SPRINGER, SCHEINBAUM and DAVIS, P.C.
611 South Addison Road
Addison, Illinois 60101
630-530-9999

CERTIFICATE OF MAILING

I, Marc C. Scheinbaum, certify that I caused a copy of this notice to be served to each addressee above by having it placed in a properly addressed envelope with proper postage prepaid, and deposited in the U.S. Mail at 175 S. Lincoln, Addison, IL, before 5:45 p.m. on May 18, 2004.



FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
MAY 20 2004
KENNETH S. GARDNER
PS REP. 116-0004

Service List:

Law Office of James M. Philbrick
P. O. Box 351
Mundelein, IL 60060

Sent via FAX: 847-949-5690

Office of the U. S. Trustee
227 West Monroe Street
suite 3350
Chicago, IL 60606

Assembled Circuits, Inc.
1550 West Fullerton Ave.
Addison, IL 60101

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KENNETH S. GARDNER, CLERK
PS REP. - KG

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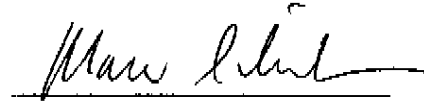
**MOTION TO VACATE ORDER MODIFYING AUTOMATIC STAY
AND ENTRY OF AGREED ORDER**

Now comes the debtor, Assembled Circuits, Inc., through counsel Kofkin, Springer, Scheinbaum and Davis P.C., and in support of this motion to vacate the order of May 17, 2004 modifying the automatic stay in favor of General Motors Acceptance Corporation "GMAC", respectfully states as follows:

1. The debtor filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code, 11 U.S.C. sections 101 et seq. (the "Code") on March 16, 2004.
2. Prior to the filing of this Chapter 11, the debtor executed 2 lease agreements between itself and GMAC for a 2002 and a 2004 Cadillac Seville.
3. The attorney for GMAC brought a motion for relief from stay on May 17, 2004 alleging that there was no insurance on either vehicle.
4. This Honorable Court entered an order modifying the automatic stay effective at 5:00 p.m. on May 17, 2004.
5. Counsel for the debtor did provide insurance information to counsel for GMAC prior to 5:00 p.m.
6. By agreement of the parties, counsel for the debtor was to bring a motion to vacate the order of May 17, 2004 modifying the automatic stay if insurance information was timely provided. Additionally, the parties agreed to a repayment / default order for the leases.
7. The debtor requests that this Honorable Court vacate the order modifying the automatic stay previously entered.
8. The parties also request that this Honorable Court enter the agreed repayment / default order.

WHEREFORE, the debtor prays for an order vacating the order of may 17, 2004 modifying the automatic stay in favor of GMAC, entering the agreed repayment / default order and granting such other and further relief as this court deems just and proper.

Respectfully Submitted:

A handwritten signature in cursive script, appearing to read "Marc Scheinbaum", written over a horizontal line.

By: Marc C. Scheinbaum (# 6180394)

Kofkin, Springer, Scheinbaum and Davis, P.C.
611 South Addison Road
Addison, Illinois 60101
(630) 530-9999